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ATTORNEYS FOR  
DEFENDANT NETFLIX, INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

BROADCOM CORPORATION *et al.*,  
  
Plaintiffs,  
  
v.  
  
NETFLIX, INC.,  
  
Defendant.

Case No. 3:20-cv-04677-JD

**JOINT STIPULATION FOR EXTENSION  
OF TIME; [PROPOSED] ORDER**

Judge: Honorable James Donato

Date Filed: March 13, 2020

Trial Date: December 4, 2023

Pursuant to Local Rules 6-2 and 7-12, Plaintiffs Broadcom Corporation and Avago Technologies International Sales PTE. Limited (“Plaintiffs”) and Defendant Netflix, Inc. (“Netflix”) (collectively, the “Parties”), by and through their respective counsel, hereby stipulate and request as follows:

WHEREAS, the Court issued a Scheduling Order (ECF 261) setting case deadlines;

WHEREAS, the Scheduling Order requires the Parties to complete fact discovery by November 10, 2022 and exchange opening expert disclosures by December 16, 2022;

WHEREAS, the Parties have been working on completing their document productions and scheduling fact-witness depositions, but due to multiple reasons, it has proven impossible to complete all fact-witness depositions by the current fact-discovery cut-off;

WHEREAS, all fact-witness depositions must be completed sufficiently in advance of the expert disclosure deadline, to ensure the exchange of complete expert disclosures;

WHEREAS, the Parties have not previously requested any modification to the Scheduling Order;

WHEREAS, the Parties’ proposed modifications to the Scheduling Order will have no effect on the dispositive-motion deadline or trial date;

WHEREAS, the Parties agree that no new discovery requests, including subpoenas (other than cross-subpoenas), will be served and no new party or third-party depositions will be permitted if the party seeking the deposition did not indicate to the opposing party an intention to take such deposition before the original fact-discovery cut-off of November 10, 2022; and

NOW THEREFORE, the Parties respectfully request that this Court order the following modifications to the Scheduling Order:

Event	Current Deadline	Proposed Deadline
Add parties or amend pleadings	Closed	<i>Unchanged</i>
Deadline to meet and confer re: claim reduction	Closed	<i>Unchanged</i>

Deadline to agree to claim reduction or file a motion for claim reduction	Closed	<i>Unchanged</i>
Deadline to meet and confer re: prior art reduction	November 7, 2022	<i>Completed</i>
Deadline to substantially complete production of documents in response to RFPs served prior to October 10, 2022	N/A	November 11, 2022
Deadline to agree to prior art reduction or file a motion for prior art reduction	November 14, 2022	<i>Completed</i>
Deadline to produce requested ESI as to custodians Peisong Chen and Rich Nelson	N/A	November 15, 2022
Deadline to produce requested ESI as to remaining custodians	N/A	November 18, 2022
Deadline to supplement discovery responses	N/A	November 21, 2022
Deadline to provide final supplemental discovery responses before fact-discovery cut-off	N/A	December 9, 2022
Fact discovery cut-off	November 10, 2022	December 15, 2022
Expert disclosures	December 16, 2022	January 20, 2023
Rebuttal expert disclosures	February 8, 2023	March 15, 2023
Expert discovery cut-off	March 29, 2023	April 7, 2023
Last day to file dispositive and <i>Daubert</i> motions	May 2, 2023	<i>Unchanged</i>
Exchange of deposition and discovery response	May 11, 2023	<i>Unchanged</i>

designations		
Deadline to file responsive briefs to dispositive and <i>Daubert</i> motions	May 23, 2023	<i>Unchanged</i>
Lead trial counsel to meet and confer re: preparation of joint pretrial materials	May 30, 2023	<i>Unchanged</i>
Exchange counter-designations and objections to deposition and discovery-response designations	June 1, 2023	<i>Unchanged</i>
Deadline to file reply briefs to dispositive and <i>Daubert</i> motions	June 6, 2023	<i>Unchanged</i>
Exchange exhibits and exhibit lists	September 26, 2023	<i>Unchanged</i>
Exchange objections to exhibit lists	October 12, 2023	<i>Unchanged</i>
Exchange witness lists	October 12, 2023	<i>Unchanged</i>
Parties exchange motions <i>in limine</i>	October 19, 2023	<i>Unchanged</i>
Parties exchange oppositions to motions <i>in limine</i>	October 26, 2023	<i>Unchanged</i>
Pretrial filings	November 2, 2023	<i>Unchanged</i>
Pretrial conference	November 16, 2023 at 1:30 p.m.	<i>Unchanged</i>
Parties to file deposition and discovery designations, including counter-designations and objections	November 30, 2023	<i>Unchanged</i>
Jury Trial	December 4, 2023, at 9:00 a.m.	<i>Unchanged</i>

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: \_\_\_\_\_

\_\_\_\_\_  
HONORABLE JAMES DONATO  
UNITES STATES DISTRICT JUDGE

KEKER, VAN NEST & PETERS LLP

/s/ Richard L. Wynne, Jr.

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/s/ Katie Lynn Joyce

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**ATTESTATION**

In accordance with Civil Local Rule 5-1(h)(3), I attest that each of the signatories have concurred in the filing of this document.

Dated: November 10, 2022

By: /s/ Katie Lynn Joyce  
KATIE LYNN JOYCE